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Chapter 7 Trustee

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH**

In re:

JERROD GRANT ROBKER, III,

Debtor.

Bankr. Case No. 22-23945

Chapter 7

The Honorable William T. Thurman

**CHAPTER 7 TRUSTEE'S *EX PARTE* MOTION FOR EXAMINATION
AND PRODUCTION OF DOCUMENTS UNDER FED. R. BANKR. P. 2004
AND LOCAL RULE 2004-1 (HAILEE PLEASANT)**

Michael F. Thomson, the duly-appointed Chapter 7 Trustee (the "Trustee") for the bankruptcy estate of Jerrod Grant Robker, III (the "Debtor") in the above-captioned bankruptcy case, hereby files this *ex parte* motion (the "Motion") seeking an order authorizing an examination of Hailee Pleasant ("Ms. Pleasant") under Rule 2004 of the Federal Rules of Bankruptcy Procedure and Local Rule 2004-1. In support hereof, the Trustee states as follows:

1. On October 7, 2022 (the "Petition Date"), the Debtor filed a voluntary petition under Chapter 7 of the United States Bankruptcy Code.
2. The Trustee is the duly appointed Chapter 7 trustee in the above-referenced case.
3. According to information obtained by the Trustee, Ms. Pleasant may have information concerning the assets and financial condition of the Debtor.
4. Pursuant to Rule 2004 and Local Rule 2004-1, the Trustee requests an Order directing Ms. Pleasant to appear and submit to an examination, to be taken under oath on a date

and at a location to be later determined, such that (1) the date of the examination not be less than 14 days after written notice of such examination has been given to Ms. Pleasant and (2) the location of the examination not be more than 100 miles from where Ms. Pleasant resides, is employed, or regularly conducts business in person. The oral examination shall relate to all topics permitted by Rule 2004.

5. Also, pursuant to Rule 2004 of the Bankruptcy Rules and Rule 2004-1 of the Local Rules, the Trustee also requests an Order authorizing the Trustee to issue a subpoena to Ms. Pleasant for the production of documents to Michael F. Thomson, 222 South Main Street, Suite 1730, Salt Lake City, UT 84101, on or before February 11, 2025, concerning vehicles owned by the Debtor at any time during the period of October 1, 2020 through October 22, 2022, including, but not limited to, a 2001 Milan 260L and a 2012 Infiniti G37, and concerning her purchase of the 2012 Infiniti G37.

6. The undersigned counsel hereby represents that the deadlines set forth herein for the production of documents and examination of Ms. Pleasant will provide Ms. Pleasant with not less than 14 days of written notice.

WHEREFORE, the Trustee requests that the Court enter an Order approving the Rule 2004 examination and authorizing the Trustee to issue all necessary subpoenas. The Trustee will serve Ms. Pleasant with the Court's Order, together with subpoenas incorporating the documents and information outlined above.

DATED this 17th day of January 2025.

/s/ Michael F. Thomson

Michael F. Thomson
Chapter 7 Trustee

CERTIFICATE OF SERVICE – BY NOTICE OF ELECTRONIC FILING (CM/ECF)

I hereby certify that on this 17th day of January 2025, I electronically filed the foregoing **CHAPTER 7 TRUSTEE’S EX PARTE MOTION FOR EXAMINATION AND PRODUCTION OF DOCUMENTS UNDER FED. R. BANKR. P. 2004 AND LOCAL RULE 2004-1 (HAILEE PLEASANT)** with the United States Bankruptcy Court for the District of Utah by using the CM/ECF system. I further certify that the parties of record in this case, as identified below, are registered CM/ECF users and will be served through the CM/ECF system.

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/s / Michelle Stuver